

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO,
et al.,

Plaintiffs,

v.

THE STATE OF TEXAS, et al.,

Defendants.

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Consolidated Case No. 5:21-CV-0844-XR

***LUPE, OCA-GREATER HOUSTON, HAUL, LULAC, AND MI FAMILIA VOTA*
PLAINTIFFS' FIFTH SUPPLEMENTAL RULE 26(a)(1) INITIAL DISCLOSURES**

Pursuant to Federal Rule of Procedure 26(a)(1), and the Court's November 18, 2021, Order, ECF NO. 125, the *LUPE, OCA-Greater Houston, HAUL, LULAC*, and *Mi Familia Vota* Plaintiffs ("Plaintiffs") make the following supplemental disclosures:

I. Supplemental Initial Disclosure Qualifications

These supplemental disclosures are made upon information presently known to Plaintiffs and without prejudice to Plaintiffs' right to produce during discovery or at trial such data, information or documents as are: (a) subsequently discovered; (b) subsequently determined to be relevant for any purpose; or (c) subsequently determined to have been omitted from this and any supplemental disclosure statements. By making these disclosures, Plaintiffs do not represent that they are identifying every document, tangible thing, or witness that may be relevant to the issues in this lawsuit, or on which Plaintiffs may rely in support of their claims or defenses. Nor do Plaintiffs waive their rights to object to the disclosure of any person, document, or thing on the basis of any applicable privilege, the work product doctrine, relevancy, competency, materiality, undue burden, hearsay, or any other valid objection in response to any discovery request or

proceeding in this case. Further, Plaintiffs reserve all rights to present at trial or other hearing in this matter additional witnesses and evidence not presently identified or encompassed by these disclosures, and to present any rebuttal or impeachment evidence they deem appropriate.

II. Supplemental Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(i))

In addition to the persons identified in Plaintiffs' previous disclosures, the following individuals are likely to have discoverable information that Plaintiffs may use to support their claims and/or defenses, not including information to be used solely for impeachment.

1. Peggy Ingram, Ph.D., on behalf of HAUL Plaintiffs

Dr. Ingram may be contacted through counsel for HAUL Plaintiffs. Dr. Ingram is likely to have discoverable information regarding the conduct of poll watchers in past elections as well as regarding her prior experience transporting voters to the polls.

2. Deion Dorsett, on behalf of HAUL Plaintiffs

Mr. Dorsett may be contacted through counsel for HAUL Plaintiffs. Mr. Dorsett is likely to have discoverable information regarding the use of drive-through voting in the 2020 general election and the impact of its prohibition through SB1.

3. Nancy Crowther on behalf of Plaintiffs HAUL and OCA-GH.

Ms. Crowther may be contacted through counsel for OCA-GH Plaintiffs at Disability Rights Texas, 2222 West Braker Lane, Austin, Texas 78758 and HAUL Plaintiffs at 1825 K Street, NW, Suite 1200 Washington, DC 20006. Ms. Crowther is a member of The Arc of Texas and

REVUP-Texas and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail or need assistance in voting.

4. Penni Lemonn on behalf of Plaintiffs HAUL and OCA-GH.

Ms. Lemonn may be contacted through counsel for OCA-GH Plaintiffs at Disability Rights Texas, 2222 West Braker Lane, Austin, Texas 78758 and HAUL Plaintiffs at 1825 K Street, NW, Suite 1200 Washington, DC 20006. Ms. Lemonn is a member of The Arc of Texas and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail or need assistance in voting.

5. Dave Chapple on behalf of Plaintiffs HAUL

Mr. Chapple may be contacted through counsel for OCA-GH Plaintiffs at Disability Rights Texas, 2222 West Braker Lane, Austin, Texas 78758 and HAUL Plaintiffs at 1825 K Street, NW, Suite 1200 Washington, DC 20006. Mr. Chapple has previously been disclosed by OCA-GH as a member of REVUP-Texas and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail or need assistance in voting.

6. Weendie Noriega on behalf of Plaintiffs HAUL and OCA-GH.

Ms. Noriega may be contacted through counsel for OCA-GH Plaintiffs at Disability Rights Texas, 2222 West Braker Lane, Austin, Texas 78758 and HAUL Plaintiffs at 1825 K Street, NW, Suite 1200 Washington, DC 20006. Ms. Noriega is a member of The Arc of Texas and REVUP-Texas and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail or need assistance in voting.

7. Yolanda Ross on behalf of Plaintiffs HAUL and OCA-GH.

Ms. Ross may be contacted through counsel for OCA-GH Plaintiffs at Disability Rights Texas, 2222 West Braker Lane, Austin, Texas 78758 and HAUL Plaintiffs at 1825 K Street, NW, Suite 1200 Washington, DC 20006. Ms. Ross is a member of The Arc of Texas and REVUP-Texas and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail or need assistance in voting.

8. Jessica Anderson

214 Massachusetts Avenue NE, Washington, DC 20002, (202) 548-5280. Ms. Anderson is likely to have discoverable information regarding communications between Heritage Action for America and members of the Texas Legislature regarding the substance of SB 1 and its predecessor bills.

B. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(ii))

Plaintiffs make no supplements to the First Amended Initial Disclosures with respect to the documents in their possession, custody, or control.

C. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered (Fed. R. Civ. P. 26(a)(1)(A)(iii))

Plaintiffs do not seek damages in this action; however, Plaintiffs intend to seek recovery of attorneys' fees and costs incurred in this litigation.

Dated May 11, 2022.

Respectfully submitted,

/s/ Georgina Yeomans

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CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2022, the foregoing document was served via e-mail to all counsel of record.

/s/ Georgina Yeomans